

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

Becky Berscheid, )  
 )  
 Plaintiff, )  
 )  
 v. ) Case No. 0:22-cv-00086  
 )  
 Experian Information Solutions, Inc., )  
 )  
 Defendant. )  
 )  
 )

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**EXPERIAN INFORMATION SOLUTIONS, INC.'S NOTICE OF REMOVAL**

1. Pursuant to 28 U.S.C. § 1441 et seq., Defendant Experian Information Solutions, Inc. (“Experian”) hereby files this Notice of Removal of the above-captioned action to this Court and states as follows:
2. Experian is named Defendant in a civil action initiated by Plaintiff Becky Berscheid (“Plaintiff”) in the Seventh Judicial District for the State of Minnesota, Stearns County on or around December 21, 2021 (the “State Court Action”).
3. Experian was served with a copy of Plaintiff’s initial pleading on December 27, 2021.
4. As of the date of this Notice, Experian has not received notice that Plaintiff’s initial pleading has been filed in state court, and it is Experian’s understanding that Plaintiff’s initial pleading has not been filed in state court.

5. This Notice is being filed with this Court within thirty (30) days after Experian received a copy of Plaintiff’s initial pleading setting forth the claims for relief upon which Plaintiff’s action is based.

6. This Court is the proper district court for removal because the State Court Action is pending within this district.

7. Pursuant to 28 U.S.C. § 1446(a), a copy of all process, pleadings, and orders served upon Experian are attached hereto as Exhibit A. Experian has not been served with any other documents related to this action.

8. Experian is the sole Defendant in this action.

9. The claims for relief against Experian alleged in the State Court Action arise under the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* Thus, this Court has original subject matter jurisdiction over the above-captioned action pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1681p. The above-captioned action may properly be removed to this United States District Court pursuant to 28 U.S.C. § 1441(a).

10. Promptly after the filing of this Notice of Removal, Experian shall provide notice of the removal to Plaintiff through his attorney of record in the State Court Action, as required by 28 U.S.C. § 1446(d).

Dated: January 14, 2022

Respectfully submitted,

By: s/Chelsea A. Bunge-Bollman  
Chelsea A. Bunge-Bollman  
Bar Number 0401297  
Attorney for Defendant Experian Information  
Solutions, Inc.  
Jones Day  
90 South 7th Street, Suite 4950  
Minneapolis, MN 55402  
Telephone: (612) 217-8868  
Fax: (844) 345-3178  
cbungebollman@jonesday.com